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**PROPOSED ATTORNEYS FOR KRISU HOSPITALITY, LLC  
DEBTOR AND DEBTOR IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:	§	
	§	Case No. 19-20347
KRISU HOSPITALITY, LLC ,	§	(Chapter 11)
	§	
Debtor.	§	<b>EXPEDITED HEARING REQUESTED</b>
	§	

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**MOTION TO MAINTAIN BANK ACCOUNTS**

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**TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:**

Krisu Hospitality, LLC debtor and debtor in possession (“Krisu” or the “Debtor”) file this *Motion to Maintain Bank Accounts* (the “Motion to Maintain Bank Accounts”) and in support thereof would show the Court the following.

**INTRODUCTION**

1. This motion seeks authorization for the Debtor to maintain its deposit accounts at Centennial Bank and Happy State Bank through at least December 15, 2019 and/or until the Debtor is able to transition to an authorized debtor in possession depository bank.

### **JURISDICTION AND VENUE**

2. The Court has jurisdiction over this action pursuant to, and without limitation §§ 105, 363, 507, and 1101 et seq. of the United States Bankruptcy Code, 11 U.S.C. § 101 et seq. (the “Code”).

3. Venue action is proper in this Court pursuant to 28 U.S.C. § 1409.

4. The Court may try this action to a conclusion and enter final orders under *Stern v. Marshall*, 131 S. Ct. 2594 (U.S. 2011).

### **FACTUAL BACKGROUND**

#### **The identify and background of the Debtors and Debtors in Possession.**

5. Krisu constructed, and owns and operates the LaQuinta Inn & Suites hotel in Pampa, Texas.

#### **The Commencement of the Bankruptcy Case.**

6. On November 4, 2019, Krisu commenced the above-captioned Chapter 11 case by filing a voluntary petition.

7. The factors leading to the commencement of this case include the (1) lingering effects of replacement of the original general contractor and delayed opening of the hotel, (2) changes in the Choice-Wyndham reservations and payment system which interrupted receipts on corporate accounts, and (3) difficult economic conditions in the rural Texas Panhandle resulting from fluctuations in the energy industry.

#### **Factual background in support of the relief requested.**

8. Krisu maintains its primary operating account at Centennial Bank.

9. Krisu maintains its cash deposits accounts at Happy State Bank.

10. A limited number of authorized debtor in possession depository bank branch offices exist with offices located in the Amarillo Division.

### **RELIEF REQUESTED**

11. Accordingly, pursuant to Code §§ 105 and/or 363, Krisu respectfully requests that Krisu its deposit accounts at Centennial Bank and Happy State Bank through at least December 15, 2019 and/or until the Debtor is able to transition to an authorized debtor in possession depository bank without the necessity of opening separate, new debtor-in-possession accounts, but subject to appropriate designations and/or markings on the accounts and or any checks to reflect the bankruptcy case.

12. A proposed form of final order accompanies this Motion to Maintain Bank Accounts and is incorporated by reference herein.

### **BASIS OF RELIEF**

13. Maintenance of the two bank accounts will greatly aid in the administration of this case, permit Krisu to conduct uninterrupted business operations, and reduce the immediate burden on Krisu.

14. Furthermore, only a small handful of branch offices exist in the Amarillo Division of the banks on the U.S. Trustee authorized list.<sup>1</sup>

### **RESERVATION OF RIGHTS**

15. Krisu reserves the right to amend and/or supplement this Motion to Maintain Bank Accounts prior to any hearing.

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<sup>1</sup> See [https://www.justice.gov/ust-regions-r06/file/authorized\\_depository.pdf/download](https://www.justice.gov/ust-regions-r06/file/authorized_depository.pdf/download).

### NOTICE

16. Krisu through the undersigned counsel has provided notice of this Motion to Maintain Bank Accounts and the related request for an expedited hearing to the parties entitled to notice under L.B.R. 9007-1(b) and by electronic means where available.

17. As indicated below, a Certificate of Service separate from this Motion to Maintain Bank Accounts will be filed.

### CONCLUSION AND PRAYER

WHEREFORE, Krisu Hospitality, LLC, the debtor and debtor-in-possession, respectfully requests that the Court enter an order granting the Motion to Maintain Bank Accounts and the relief requested herein. Debtor respectfully request that the Court grant to Debtor such other and further relief to which the Debtor is entitled at law or in equity.

Dated: November 6, 2019

Respectfully submitted:

### SWINDELL LAW FIRM

By: /s/ Patrick A. Swindell  
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POSSESSION

### CERTIFICATE OF SERVICE

A separate Certificate of Service will be filed.

/s/ Patrick A. Swindell

Patrick A. Swindell

**PROPOSED FINAL ORDER**